

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CARLOS MARTIN DE LA CRUZ, *on behalf
of himself, FLSA Collective Plaintiffs and the
Class,*

Plaintiff,

v.

MANHATTAN PARKING GROUP LLC
d/b/a MANHATTAN PARKING GROUP,
METROPOLITAN PARKING GROUP LLC,
UPTOWN PARKING CORP., RELIABLE
PARKING CORP., PROVO PARKING LLC,
POO PARKING CORP., MP GARDEN
OPERATING LLC, MP WEST 30 LLC, MP
GARDEN OPERATING LLC, 1020
PARKING LLC, LAWRENCE LIPMAN,
GREG GONZALEZ, RAFAEL
MALDONADO and JOHN DOE ENTITIES
1-100,

Defendants.

Civil Action No.: 20-cv-977 (BCM)

**NOTICE OF PLAINTIFF’S SECOND UNOPPOSED MOTION FOR AN ORDER
(1) CONDITIONALLY CERTIFYING SETTLEMENT CLASS, (2) GRANTING
PRELIMINARY APPROVAL TO PROPOSED CLASS ACTION SETTLEMENT AND
PLAN OF ALLOCATION, (3) DIRECTING DISSEMINATION OF NOTICE AND
RELATED MATERIAL TO THE CLASS, AND
(4) SETTING DATE FOR FAIRNESS HEARING AND RELATED DATES**

For the reasons set forth in the Memorandum of Law in Support of Plaintiff’s Unopposed Motion for an Order (1) Conditionally Certifying Settlement Class, (2) Granting Preliminary Approval to Proposed Class Action Settlement and Plan of Allocation, (3) Directing Dissemination of Notice and Related Material to the Class, (4) Setting Date for Fairness Hearing and Related Dates (“Motion for Preliminary Approval”), the Declaration of C.K. Lee in Support of Plaintiff’s Motion for Preliminary Approval (“Lee Declaration”), Plaintiff respectfully requests that the Court

enter an Order:

- (1) granting preliminary approval of the Settlement Agreement and Release between Carlos Martin de la Cruz (“Plaintiff”) and Manhattan Parking Group LLC d/b/a Manhattan Parking Group, Metropolitan Parking Group LLC, Uptown Parking Corp., Reliable Parking Corp., Provo Parking LLC, Poo Parking Corp., MP Garden Operating LLC, MP West 30 LLC, 1020 Parking LLC, Lawrence Lipman, Greg Gonzalez, Rafael Maldonado and John Doe Entities 1-100 (“Defendants”) (“Settlement Agreement”), attached as Exhibit A to Lee Declaration;
- (2) conditionally certifying the proposed class for settlement purposes;
- (3) appointing Lee Litigation Group, PLLC (“Lee Litigation Group” or “Plaintiff’s Counsel”) as Class Counsel;
- (4) appointing Arden Claims Service as Claims Administrator;
- (5) approving the proposed Notice of Proposed Class Action Settlement, attached as Exhibit B to Lee Declaration; and
- (6) granting such other, further, or different relief as the Court deems just and proper.

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For the Court’s convenience, Plaintiff has contemporaneously submitted a Proposed Order, attached hereto as **Exhibit 1**.

Dated: New York, New York

September 17, 2021

Respectfully submitted,

LEE LITIGATION GROUP, PLLC

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